

**SHAFFY MOEEL**

California Bar No. 238732

**FEDERAL DEFENDERS OF SAN DIEGO, INC.**

225 Broadway, Suite 900

San Diego, California 92101-5008

Telephone: (619) 685-3714

shaffy\_moeel@fd.org

Attorneys for Mr. Takacs

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
(HONORABLE IRMA E. GONZALEZ)

UNITED STATES OF AMERICA,	)	Case No. 07CR3086-IEG
	)	
Plaintiff,	)	Date: April 1, 2008
	)	Time: 9:00 a.m.
v.	)	
	)	MOTION FOR ORDER
DREW GERALD TAKACS,	)	<u>TO SHORTEN TIME</u>
	)	
Defendant.	)	

---

The above-named defendant, by and through counsel, moves this Court for an order shortening time in his attached OBJECTIONS TO PRE-SENTENCE REPORT, eight (8) days, to be heard on APRIL 1, 2008, at 9:00 am. or as soon thereafter as counsel may be heard for the following reasons:

Counsel apologizes to the Court for this late filing. Counsel assures this Court that it is not her practice to file pleadings or papers in an untimely manner. Counsel apologizes to this Court and all parties and requests that this Court grant her motion for an order shortening time. Counsel will hand deliver a courtesy copy to the Assistant United States Attorney David Leshner.

Respectfully submitted,

/s/ Shaffy Moeel

**SHAFFY MOEEL**

Federal Defenders of San Diego, Inc.

Attorneys for Mr. Takacs

Dated: March 23, 2008

**CERTIFICATE OF SERVICE**

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of her information and belief, and that a copy of the foregoing document has been served this day upon:

**Eugene Litvinoff**  
Eugene.Litvinoff@usdoj.gov

Dated: March 23, 2008

/s/ Shaffy Moeel  
SHAFFY MOEEL  
Federal Defenders of San Diego, Inc.  
225 Broadway, Suite 900  
San Diego, CA 92101-5030  
(619) 234-8467 (tel)  
(619) 687-2666 (fax)  
e-mail: Shaffy\_Moeel@fd.org